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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RFB-EJY

Case No.: 2:19-cv-01222-~~JAD-EJY~~

11 ELISABETH LITCHFIELD, an individual,
12 Plaintiff,

13 v.

14 TARGET CORPORATION., and; DOES 1
15 through 100; and ROE CORPORATION 101
16 through 200, inclusive,
17 Defendant(s).

**STIPULATION AND ORDER
REGARDING RESPONSE TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT**

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19 Discovery on this matter closed on October 23, 2020. Prior to the close of
20 discovery, Plaintiff requested the 30(b)(6) deposition of defendant's representative.
21 However, due to scheduling conflicts and COVID related delays, the deposition has not
22 been able to be scheduled prior to the October 23, 2020 discovery deadline. The parties
23 have agreed to allow the deposition to take place after the close of discovery given the
24 scheduling difficulties. The deposition will proceed forward on December 16, 2020.

25 On November 24, 2020, Defendant filed a Motion for Summary Judgment, ECF
26 Document No. 26. The Court previously granted an extension of Plaintiff's response to
27 January 6, 2021, due to the delay in obtaining dates for the Defendant's deposition.
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1 The transcript of the deposition was received on January 30, 2020, however,
2 counsel for Plaintiff has been ill due to contracting the COVID-19 virus and is requesting
3 an additional week to be able to complete their response. Therefore, the parties have agreed
4 and stipulate that the response to Defendant's Motion could be extended from January 6,
5 2021 to January 13, 2021.

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7 **BERNSTEIN & POISSON**

PERRY & WESTBROOK, P.C

8 **DATED: JANUARY 6, 2021**

DATED: JANUARY 6, 2021

9
10 /s/ Amber N. King
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16 **IT IS SO ORDERED:**

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20 **RICHARD E. BOULWARE, II**
21 **United States District Court**

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DATED this 7th day of January, 2021.